Remarks

I. Administrative Overview

Claims 1-53 were presented for examination. Applicants hereby amend Claims 1-2, 6-21, 23-31, 33-34 and 47-53; and cancel Claim 22. Applicants further add Claim 54 as a new claim dependent on Claim 1. Support for Claim 54 can be found in paragraphs 69-75 of the present disclosure. Upon entry of the present amendments, Claims 1-21 and 23-54 are presented for examination, of which Claims 1 and 35 are independent claims. No new matter has been introduced.

Applicants respectfully request reconsideration and withdrawal of the objections and rejections to the claims as amended.

II. Rejections under 35 U.S.C. § 102(e)

Claims 1-13, 20-38 and 45-53 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Publication Number 2004/0215826 A1 to Pfitzner ("Pfitzner"). Applicants respectfully submit that Claims 1-13, 20-38 and 45-53 are not anticipated by Pfitzner. Nevertheless, Claims 1-2, 6-13, 20-31, 33-34 and 47-53 have been amended to more clearly recite the claimed invention. Thus, Applicants respectfully submit that Claims 1-13, 20-38 and 45-53, as amended, are not anticipated by Pfitzner.

Anticipation is shown when a reference discloses each and every limitation of a claimed invention. Applicants respectfully submit that Pfitzner fails to disclose each and every limitation of the claimed invention.

Pfitzner fails to disclose "determining a file type for the file" as required by independent Claims 1 and 35. Instead, Pfitzner describes the translation of a location-independent reference address into a reference address by reviewing variables such as a business object type. (*See* Pfitzer, Abstract; pgs. 4-5, paragraphs 36, 38). Determining the type of business object to be accessed includes, for example, determining whether the object is a sales order, a sales call, customer information or an appointment. (*See* Pfitzner, p. 4, paragraph 38). In Pfitzner, business object types are used to categorize. Determining the categorization of a business object is not the same as determining a file type. Thus, Pfitzner fails to disclose "determining a file type for the file."

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For the above-mentioned reasons, Pfitzner fails to disclose each and every limitation of independent Claims 1 and 35. Thus, Claims 1 and 35 are patentable over Pfitzner. Claims 2-13, 20-38 and 45-53 are dependent on Claims 1 and 35, respectively, and so are also patentable over Pfitzner. In light of these remarks, Applicants respectfully request that the Examiner withdraw all rejections made under 35 U.S.C. § 102.

III. Rejections under 35 U.S.C. § 103(a)

Claims 14-16 and 39-44 are rejected under 35 U.S.C. § 103(a) as un-patentable over Pfitzner in view of U.S. Patent Number 6,519,581 to Hofmann et al. ("Hofmann"). While Claim 17 is rejected under 35 U.S.C. § 103(a) as un-patentable over Pfitzner in view of U.S. Patent Publication Number 2001/0023421 A1 to Numao et al. ("Numao"). Claims 18-19 are rejected under 35 U.S.C. § 103(a) as being un-patentable over Pfitzner in view of U.S. Patent Number 6,868,451 B1 to Peacock ("Peacock"). Applicants submit that Claims 14-19 are patentable over any combination of Pfitzner, Hofmann, Numao and Peacock. Nevertheless, Claims 14-19 have been amended to more clearly recite the claimed invention. Thus, Applicants respectfully submit that Claims 14-19, as amended, are patentable over any combination of Pfitzner, Hofmann, Numao and Peacock.

Obviousness is shown when two or more references either alone or in combination, teach or suggest each and every limitation of the claimed invention. Applicants respectfully submit that any combination of Pfitzner, Hofmann, Numao and Peacock fails to teach or suggest each and every limitation of the claimed invention.

As with Pfitzner, neither Hofmann, Numao nor Peacock teach or suggest "determining a file type for the file" as required by independent Claims 1 and 35. Thus, neither Hofmann, Numao nor Peacock cure the deficiencies present in Pfitzner. For this reason, any combination of Pfitzner, Hofmann, Numao and Peacock fails to teach or suggest each and every limitation of independent Claim 1. Claim 1 is therefore patentable over any combination of Pfitzner, Hofmann, Numao and Peacock. Claims 14-16 are dependent on Claim 1, therefore, Claims 14-16 are also patentable over any combination of Pfitzner, Hofmann, Numao and Peacock. Applicants, therefore, respectfully request that the Examiner withdraw all rejections made under 35 U.S.C. § 103.

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IV. Conclusion

Applicants contend that the Examiner's rejections are adequately addressed by the remarks above, and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all rejections and objections, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted, CHOATE, HALL & STEWART LLP

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